UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| In Re "A Million Little Pieces Litigation" | MDL Docket No. 1771 |
| THIS DOCUMENT RELATES TO ALL ACTIONS | |

**"A MILLION LITTLE PIECES" PLAINTIFFS' GROUP'S NOTICE OF MOTION FOR CONSOLIDATION AND APPOINTMENT OF CO-INTERIM CLASS COUNSEL**

PLEASE TAKE NOTICE that Plaintiffs Marcia Vedral, Michele Snow, Diane Marolda, Sara Brackenrich, Jimmy Floyd, Jill Giles, Pilar More, Stuart Oswald, Shera Paglinawan, and Ann Marie Strack (hereinafter "AMLP Plaintiffs' Group," "Movant" or collectively "Plaintiffs") by and through their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating for all purposes the above-captioned related actions pursuant to F.R.C.P. 42(a); (ii) approving Movant's selection of the law firm of Brodsky & Smith, LLC and Larry D. Drury, Ltd. to serve as Co-Interim Class Counsel pursuant to F.R.C.P. 23(g); and (iii) granting such other and further relief as the Court may deem just and proper. In support of this motion, Movant submits herewith a Memorandum of Law,

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Declaration of Evan J. Smith, Esquire and Scott Frost, Esquire.

Dated: September 22, 2006

Respectfully submitted,

**LAW OFFICES OF THOMAS M. MULLANEY**

By:*/s/ Thomas M. Mullaney (TM4274)*
Thomas M. Mullaney, Esquire
708 Third Avenue, Suite 2500
New York, NY 10017
Telephone: (212) 223-0800
Facsimile: (212) 661-9860

***Liaison Counsel for Class and***
**Attorneys for Plaintiff Diane Marolda**

**BRODSKY & SMITH, LLC**
By: */s Evan J. Smith, Esquire (ES3254)*
Evan J. Smith, Esquire (ES3254)
240 Mineola Blvd.
Mineola, NY 11501
Telephone: (516) 741-4977
Facsimile: (516) 741-0626

***[Proposed] Co-Interim Class Counsel***
**and Attorneys for Plaintiff Michele Snow**

Larry D. Drury, Esquire
Larry D. Drury, Ltd.
205 W. Randolph Street, Suite 1430
Chicago, IL 60606
Telephone: (312) 346-7950
Facsimile: (312) 346-5777

***[Proposed] Co-Interim Class Counsel***
**and Attorneys for Plaintiff Marcia Vedral**

John H. Alexander, Esquire
John H. Alexander & Associates, LLC
100 West Monroe, 21st Floor
Chicago, IL 60602

**Attorney for Plaintiff Marcia Vedral**

[Additional Counsel Appear on Next Page]

Alan S. Ripka, Esquire
Napoli Berm Ripka
115 Broadway
New York, NY 10006
**Attorney for Plaintiff Jimmy Floyd**

Thomas E. Pakenas, Esquire
Dale and Pakenas
641 Lake Street, Suite 400
Chicago, Il 60661
**Attorney for Plaintiff Pilar More**

Thomas A. Zimmerman, Jr., Esquire
Zimmerman and Associates, P.C.
100 West Monroe, Suite 1300
Chicago, IL 60603
**Attorney for Plaintiff Ann Marie Atrack**

Michael David Myers, Esquire
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, WA 98101
**Attorney for Plaintiffs Shera Paglinawan and Wendy Shaw**

Scott C. Frost, Esquire
Statman, Harris, Siegel & Eyrich, LLC
333 West Wacker Drive, Suite 1710
Chicago, IL 60606
**Attorney for Plaintiff Jill Giles**

John H. Alexander, Esquire
John H. Alexander & Associates, LLC
100 West Monroe, 21st Floor
Chicago, IL 60602
**Attorney for Plaintiff Marcia Vedral**

Brian C. Witter, Esquire
DiTommaso Lubin
17 West 220, 22nd Street
Oakbrook Terrace, IL 60181
**Attorneys for Plaintiff Sara Brackenrich**